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ARIZONA CORPORATION COMMISSION

March 20, 1998

Mr. Ronald R. Connors, Director
North American Numbering Plan Administration
Communications Industry Services
Lockheed Martin IMS
1200 K Street, NW
Washington, D.C. 20005

VIA FEDERAL EXPRESS

Re: Administration of the North American Numbering Plan
CC Docket No. 92-237

Dear Mr. Connors:

This letter is to notify you that the Arizona Corporation Commission ("ACC") hereby elects to retain authority over final NPA relief plan determinations resulting from number exhaust situations in Arizona.

The ACC does not elect at this time, however, to perform the additional relief planning activities now performed by US WEST Communications, Inc. It is the ACC's understanding that since the ACC has elected not to perform these additional relief planning functions at this time, that the North American Numbering Plan Administration ("NANPA") will perform, on behalf of the ACC, all of the relief planning activities now or previously performed by US WEST Communications, Inc.

Notwithstanding that the ACC has opted not to take on additional relief planning activities at this time, the ACC interprets its authority in the future as including the ability to not only determine which relief plan is most appropriate in number exhaust situations, but to make changes and/or modifications to the proposed relief plans submitted to it by NANPA. Finally, the ACC is also of the understanding that it may, at any time, opt to undertake any or all of the additional relief planning activities contained on the attached list (Exhibit A) in the future.

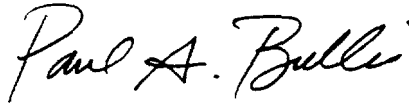
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List A B C D E

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If the ACC's understanding of any of these points is not correct, I request that you notify me in writing or by telephone at (602) 542-6024, so that we may amend our elections, if necessary. Thank you for your assistance with this matter.

Very truly yours,

ARIZONA CORPORATION COMMISSION

A handwritten signature in cursive script that reads "Paul A. Bullis".

Paul A. Bullis
Chief Counsel

PAB/MAS/ms

cc: Ms. Magalie Roman Salas
FCC Secretary's Office

Ms. Marion Gordon
FCC CCB Network Services Division

NPA RELIEF ACTIVITIES

The following is a list of activities associated with NPA relief planning. It is not intended as a complete list but mainly to provide some detail as to how NPA relief planning is conducted.

1. Conduct COCUS exhaust projections (currently done annually) which requires close coordination with CO code administration to obtain historical data of NXX assignments by industry segment. Will require either forecasts from service providers or the development and use of a model for projecting NPA exhaust.
2. If exhaust is imminent, i.e., within 3 years in the future more or less, notify state regulators and start the relief planning process.
3. Draft an initial planning document (IPD) for industry consideration which usually includes split and overlay options, relief periods, and the like.
4. Provide detailed maps for each of the options being considered, showing approximate boundaries in the case of geographic splits.
5. Schedule relief planning meetings and attempt to achieve consensus on a relief plan (split, overlay, permissive period, etc.). This will usually take two meetings, one way or the other.
6. Arrange for the industry meetings; location, visual aids, and other logistics.
7. Develop and maintain a list of parties for each state who would be interested or impacted by relief activities, i.e., regulators, service providers (ILECs, CLECs, EXCs, Cellular, Pagers, Cable), citizen groups, others, etc.
8. Send out meeting notices to the interested parties on the list announcing the meetings including the location, time, agenda, etc.
9. Conduct/moderate the meetings and produce minutes (usually requires 2 people to be present).
10. Distribute meeting minutes to the interested parties.
11. If consensus is reached on a relief plan, develop final plan and forward the results to the regulators, if required or requested to do so.
12. Forward approved relief plan to NANPA and request the assignment of the relief NPA in accordance with industry assignment guidelines.
13. Provide necessary information for the Planning Letters published by NANPA that announces the details of a new NPA, which include dialing plans, maps, NXX listings, key dates, contacts, etc.
14. If consensus is not reached, advise local regulators and request assistance.
15. Participate in hearings established by regulators to resolve public concerns about the relief plan; provide testimony, interrogatories, provide data as requested (may require interface with CO code administrator who has the NXX data), etc.

EXHIBIT A, PAGE 2

16. Attend public hearings that may be called by regulators or necessary by applicable state law to allow public comment on relief plans.
17. When asked and appropriate, attend other meetings to explain the relief planning process, e.g., local telephone associations.
18. When a relief plan has been approved and an NPA assigned, draft an implementation plan (usually 2-3 pages) which may consist of a customer education plan, coordination of technical issues (e.g., ANI conversions), etc.
19. Schedule an implementation meeting to kick off the project. Involvement of the administrator in implementation planning may vary from one jurisdiction to another.
20. Interface with the media to explain the relief planning process and/or answer questions.
21. Develop and maintain a list of NPA reservations in conjunction with the NANPA NPA assignment organization. One or two reservations may be made for NPAs that will be exhausting in the next 20 years as specified in industry guidelines. This effort requires close coordination with CO code administration to avoid selecting reservations that could result in dialing conflicts with current NXX assignments, e.g., a new NPA cannot be assigned that is the same as an active NXX in that NPA.
22. Be aware and cognizant of relevant state laws and regulatory issues related to relief planning.
23. Respond to incoming calls nationally & internationally related to relief planning.
24. Participate in complaint cases as they arise, e.g. which side of a split gets the new NPA.
25. Respond to requests from NANC and FCC for information, etc. concerning relief planning.
26. Meet with regulators (state, FCC), as requested.